

BROWN & CONNERY, LLP

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DEBORAH GROSS-QUATRONE,

Plaintiff,

vs.

BONNIE MIZDOL, DIANA MOSKAL,
LAURA SIMOLDONI, and JOHN and
JANE DOE 1-10

Defendants.

Civil Action No. 2:17-cv-13111-MEF-LDW

**DECLARATION OF EXHIBITS IN
FURTHER SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

I, Kathleen E. Dohn, Esq., being of full age, hereby certify as follows:

1. I am a partner with the law firm of Brown & Connery, LLP, attorneys for the Defendants, Bonnie Mizdol, Diana Moskal, Laura Simoldoni ("Defendants"), in the above matter. I am authorized to make this Declaration in further support of the Defendants' Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56.

2. Attached as Exhibit R is a true and accurate copy of an excerpt from the Deposition transcript of Bonnie Mizdol dated October 18, 2021.

3. Attached as Exhibit S is a true and accurate copy of an excerpt from the transcript of the testimony of Loretta Little at the Formal Hearing held on January 10, 2018.

I certify that the foregoing statements are true. If any of the above statements are willfully false, I am subject to punishment.

Respectfully submitted,

s/ Kathleen E. Dohn
Kathleen E. Dohn, Esquire

Dated February 26, 2024

EXHIBIT R

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEW JERSEY
3 Civ. A. No. 2:17-cv-13111-SDW-LDW
4 DEBORAH GROSS-QUATRONE, :
5 Plaintiff, :
6 vs. :
7 BONNIE MIZDOL, DIANA MOSKAL, :
8 LAURA SIMOLDONI and JOHN and :
9 JANE DOE 1-10, :
10 Defendants. :

12 VIDEOTAPED DEPOSITION OF:
13 HONORABLE BONNIE MIZDOL
14 DATE: MONDAY, OCTOBER 18, 2021
15 COMMENCING AT 9:56 A.M.

20 RENZI LEGAL RESOURCES
21 Court Reporting, Videography & Legal Services
22 2277 STATE HIGHWAY #33, SUITE 410
23 HAMILTON SQUARE, NEW JERSEY 08690
24 TEL: (609) 989-9199 TOLL FREE: (800) 368-7652
25 www.RLResources.com No. 406390

<p style="text-align: right;">98</p> <p>1 Q. And is it true that the voicemail wasn't 2 working?</p> <p>3 A. I never -- I never checked it. But I 4 assume. She represented that to me, yes.</p> <p>5 Q. Well, so you took that representation, 6 you didn't check to see --</p> <p>7 A. Of course I did.</p> <p>8 Q. Later further down in Paragraph 21, 9 "Plaintiff offered to resign. And in response Judge 10 Mizdol stated, 'You come here with your fancy clothes 11 and bare legs and you expect me to believe this?'" 12 Judge Mizdol then also implied that Plaintiff 13 couldn't handle the job."</p> <p>14 Did that happen?</p> <p>15 A. No.</p> <p>16 Q. Did Judge Gross-Quatrone ever try to 17 resign?</p> <p>18 A. I think she may have used that word 19 once. And I said -- again, I was in disbelief. I 20 couldn't believe that that was what she was saying.</p> <p>21 Q. She wanted to resign because of you; you 22 know that, right?</p> <p>22 MS. DOHN: Objection.</p> <p>24 A. No.</p> <p>25 Q. You were creating a hostile workplace</p>	<p style="text-align: right;">100</p> <p>1 MR. FERRARA: Oh, please.</p> <p>2 Q. How did that make you feel?</p> <p>3 MS. DOHN: Objection to form, but you can 4 answer.</p> <p>5 A. How did it make me feel? That I am 6 uncertain as to what is real and what is not real.</p> <p>7 Q. Okay. The parts that you think are 8 real, how did that make you feel?</p> <p>9 MS. DOHN: Objection to form.</p> <p>10 Q. You're saying she's faking, right?</p> <p>11 MS. DOHN: Objection to form. You can 12 answer.</p> <p>13 A. I'm not certain. I'm not certain 14 exactly what I think about it.</p> <p>15 Q. That's fair. Paragraph 22, Judge, says, 16 "In September 2015, Plaintiff learned that courthouse 17 staff were freely calling her Judge Diva and 18 commenting about her fancy clothes and a big ring."</p> <p>19 I think I read something in your either 20 interview or the transcript where you acknowledge 21 that you had heard that somebody called her Judge 22 Diva; is that correct?</p> <p>23 MS. DOHN: Objection to form. Counsel, 24 if you have something that you want to show her, you 25 certainly can.</p>
<p style="text-align: right;">99</p> <p>1 environment that she could not thrive in, that she 2 could not exist in. She wanted to resign because of 3 you; are you aware of that?</p> <p>4 MS. DOHN: Objection to form.</p> <p>5 A. No, no.</p> <p>6 Q. You created the instability. You 7 created the insecurity in her by yelling at her, by 8 treating her the way you did. Do you even think 9 about that?</p> <p>10 MS. DOHN: Objection to form.</p> <p>11 Q. Do you, Judge?</p> <p>12 A. Have I reflected upon it?</p> <p>13 Q. Yes.</p> <p>14 A. The answer is yes.</p> <p>15 Q. All right. You saw Judge Gross-Quatrone 16 at her deposition last week, correct?</p> <p>17 A. I did.</p> <p>18 Q. You saw how upset she was, did you?</p> <p>19 MS. DOHN: Objection to form.</p> <p>20 A. I did.</p> <p>21 Q. How did that make you feel?</p> <p>22 MS. DOHN: Objection to form.</p> <p>23 MR. FERRARA: What is the objection to 24 form?</p> <p>25 MS. DOHN: What is the relevance?</p>	<p style="text-align: right;">101</p> <p>1 MR. FERRARA: Sometimes I just like to 2 try to be efficient and move things along. But I can 3 certainly take the time to look if you'd like. If she 4 doesn't recall, then I can find it, all right?</p> <p>5 A. I don't recollect.</p> <p>6 Q. You don't remember somebody or you 7 hearing that somebody was calling her Judge Diva?</p> <p>8 A. No. She might have said it to me, but 9 it was way late on.</p> <p>10 Q. So you did hear it from somebody?</p> <p>11 A. Maybe from her. But not from staff, if 12 that's what you're asking, no.</p> <p>13 Q. What investigation did you do to see 14 whether that was happening?</p> <p>15 A. I didn't. That was in December.</p> <p>16 Q. So in December she was no longer 17 entitled to an investigation as an employee or --</p> <p>18 A. No.</p> <p>19 Q. -- she didn't have rights anymore?</p> <p>20 A. No, not at all.</p> <p>21 Q. So why didn't you do an investigation?</p> <p>22 A. Because I'm not certain that -- I'm not 23 even certain that she said that to me, truly. I 24 can't -- I've read so many different things here, I'm 25 not certain when I learned about that or whether in</p>

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1 WITNESS'S CERTIFICATION
2
3

4 HONORABLE BONNIE MIZDOL
5

6 On _____ 2021, the foregoing
7 deposition was submitted to HONORABLE BONNIE MIZDOL,
8 the witness, taken on Monday, October 18, 2021
9 for his examination.

10 At which time the deposition was read by the
11 witness and any proposed changes desired were
12 subsequently entered upon the attached errata
13 sheet.

14 Thereafter, the deposition was duly
15 witnessed and signed by:

16

17

18 Notary Public in and for the
19 County of _____
20 State of _____
21

22

23

24 My Commission Expires
25

239

1 C E R T I F I C A T E
2

3 I, RONDA L. REINSTEIN, a Certified Court
4 Reporter of the State of New Jersey, authorized to
5 administer oaths pursuant to R.S.41:2-2, do hereby
6 certify that prior to the commencement of the
7 examination, HONORABLE BONNIE J. MIZDOL, was sworn by
8 me to testify to the truth, the whole truth and
9 nothing but the truth.

10 I DO FURTHER CERTIFY that the foregoing is a
11 true and accurate transcript of the testimony as taken
12 stenographically by and before me at the time, place
13 and on the date herein before set forth, to the best
14 of my ability.

15 I DO FURTHER CERTIFY that I am neither a
16 relative nor employee nor attorney nor counsel of any
17 of the parties to this action, and that I am neither a
18 relative nor employee of such attorney or counsel, and
19 that I am not financially interested in the action.
20
21
22

23 -----
24 RONDA L. REINSTEIN, CCR No. 30X100217800
25 Dated: November 23, 2021

EXHIBIT S

SUPREME COURT OF NEW JERSEY
ADVISORY COMMITTEE
ON JUDICIAL CONDUCT
DOCKET NO. ACJC 2016-135

IN THE MATTER OF)
) TRANSCRIPT
JUDGE DEBORAH M.)
) OF
GROSS-QUATRONE,)
) FORMAL HEARING
JUDGE OF THE)
)
SUPERIOR COURT)
)

HELD ON: January 10, 2018

HELD AT: Richard Hughes Justice Complex
25 Market Street
Trenton, NJ

BEFORE: Justice Virginia A. Long
A. Matthew Boxer, Esq.
Vincent Gentile, Esq.
Susan A. Feeney, Esq.
David P. Anderson, Jr.
Karen Kessler
Paul Walker
Judge Edwin H. Stern
Judge Stephen Skillman

APPEARANCES: Maureen Bauman, Esq.
For the Committee

Adolph Galluccio, Esq.
Benjamin Light, Esq.
For the Respondent

Transcriber, AnneMarie DeAngelo
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E-mail: jjcourt@jjcourt.com

Audio Recorded

1 A Yes.

2 Q Did she get it accomplished?

3 A I don't know. She's not there anymore, so you
4 would have to make your own opinion about that.

5 Q Did Diana indicate to you why she wanted to
6 get rid of the judge?

7 A It appeared it was based on whatever happened
8 between the Children in Court team and with Judge
9 Quatrone. That's what she was indicating and maybe a
10 little bit what was going on with Nadya the law clerk.

11 UNIDENTIFIED SPEAKER: Thank you.

12 Q Were you part of any investigation by Human
13 Resources or the TCA, the trial court administrator
14 when Judge Quatrone was moved in the end of December
15 to, reassigned to Essex County? Did you have anything
16 to do with that or know anything about that?

17 A No.

18 Q But as far as your unit, it worked smoothly
19 with her, is that correct?

20 A Yes.

21 MR. GALLUCCIO: That's all I have at this
22 time.

23 JUSTICE LONG: I do have a question. Ms.
24 Little, did you convey to Judge Gross-Quatrone or to
25 Maria DeLeon or to any agent or friend of Judge Gross-

C E R T I F I C A T I O N

I, ANNEMARIE DeANGELO, the assigned transcribers, do hereby certify the foregoing transcript of proceedings on CD, playback number 10:00:35 to 5:48:11 is prepared in full compliance with the current Transcript Format for Judicial Proceedings and is a true and accurate non-compressed transcript of the proceedings as recorded, and to the best of my ability.

Annemarie DeAngelo

ANNEMARIE DeANGELO AOC #636

J&J COURT TRANSCRIBERS, INC. DATE: 3/9/18